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Administrator Gina McCarthy*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

PEBBLE LIMITED PARTNERSHIP,

Plaintiff,

v.

ENVIRONMENTAL PROTECTION  
AGENCY and GINA MCCARTHY,

Defendants.

Case No. 3:14-cv-00171-HRH

**JOINT MOTION TO ENTER  
PROTECTIVE ORDER**

Pursuant to the Scheduling and Planning Order entered in this case (ECF 137), the parties respectfully request that the Court enter the attached proposed Protective Order. Pursuant to Section 3(b)(11) of the Privacy Act of 1974, 5 U.S.C. § 552a(b)(11), the proposed Protective Order sets forth procedures for handling potentially discoverable Privacy Act protected information located in Defendants' records. The proposed Protective Order also sets forth procedures for handling potentially discoverable trade secret or confidential business or financial information located in either party's records. It also establishes protections for privileged information consistent with Rule 502(d) of the Federal Rules of Evidence and sets forth procedures to protect personally identifiable information and non-responsive information contained in otherwise responsive documents. The parties agree that its entry would facilitate the orderly progress of discovery in this case and therefore respectfully request that the Court enter the attached proposed Protective Order.

July 31, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on JULY 31, 2015, I caused to be filed electronically the foregoing JOINT MOTION TO ENTER PROTECTIVE ORDER with the Clerk of Court using the Court's CM/ECF system, which sends a Notice of Electronic Filing to counsel of record.

/s/ Robin F. Thurston  
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